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Attorney for Plaintiff,
 GREAT BOWERY INC. d/b/a TRUNK ARCHIVE

**IN THE UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION**

GREAT BOWERY INC. d/b/a TRUNK
 ARCHIVE,

Plaintiff,

v.

DELUXE BEAUTE BEVERLY MEDICAL
 SPA, A PROFESSIONAL CORPORATION
 d/b/a DELUXE COSMETIC CENTER;
 CHERYL CHEN, individually; KEVIN DO,
 individually; TIFFANY HO, individually;
 and DOES 1 through 10 inclusive,

Defendants.

Case No. 2:24-cv-1334-CBM-SK

**REQUEST FOR ENTRY OF
 CERTIFICATE OF DEFAULT AS
 TO DEFENDANTS DELUXE
 BEAUTE BEVERLY MEDICAL
 SPA, A PROFESSIONAL
 CORPORATION d/b/a DELUXE
 COSMETIC CENTER; CHERYL
 CHEN; and KEVIN DO**

Filed and Served Concurrently:

1. [Proposed] Order for Certificate of Default
2. Declaration of Mathew K. Higbee

Plaintiff GREAT BOWERY INC. d/b/a TRUNK ARCHIVE, by and through its undersigned counsel, hereby requests that the Clerk of the above-titled Court enter default in this action against Defendants Deluxe Beaute Beverly Medical Spa, A Professional Corporation d/b/a Deluxe Cosmetic Center (“Deluxe”); Cheryl Chen (“Chen”); and Kevin Do (“Do”) on the grounds that Defendants have failed to appear or otherwise respond to the Complaint in this action within the time prescribed by the Federal Rules of Civil Procedure.

1 This action was commenced on February 19, 2024. [See Doc. No. 1.]
2 Defendant Deluxe was served with the Summons and Complaint via its Agent for
3 Service, Cheryl Chen, on April 8, 2024 pursuant to Federal Rule of Civil Procedure
4 4(h). Declaration of Mathew K. Higbee in Support of Request for Entry of Certificate
5 of Default (“Higbee Decl.”) ¶ 7; [see Doc. 13]. On April 23, 2024, an executed Proof
6 of Service was filed with the Court. Higbee Decl. ¶ 8; [Doc. 13].
7

8
9 Defendant Chen was served with the Summons and Complaint via personal
10 service on April 8, 2024 pursuant to Federal Rule of Civil Procedure 4(e). Higbee Decl.
11 ¶ 9; see [Doc. 12]. On April 23, 2024, an executed Proof of Service was filed with the
12 Court. Higbee Decl. ¶ 10; [Doc. 12].
13

14 Defendant Do was served with the Summons and Complaint via personal
15 service on April 8, 2024 pursuant to Federal Rule of Civil Procedure 4(e). Higbee Decl.
16 ¶ 11; see [Doc. 14]. On April 23, 2024, an executed Proof of Service was filed with the
17 Court. Higbee Decl. ¶ 12; [Doc. 14].
18

19 The time for Defendants to answer, plead, or otherwise respond to the
20 Complaint has expired, and such time has not been extended. Higbee Decl. ¶ 14.
21

22 Defendants are not infants, nor incompetent, and the Service Members Civil
23 Relief Act of 2003 (50 U.S.C. App. § 501 et seq.) does not apply. Higbee Decl. ¶ 15.
24

25 Therefore, Plaintiff requests an entry of default against Defendants.
26

27 [SIGNATURE TO FOLLOW ON NEXT PAGE]
28

1 DATED: May 13, 2024

Respectfully submitted,

2 /s/ Mathew K. Higbee

3 Mathew K. Higbee, Esq.

4 Cal. Bar No. 241380

HIGBEE & ASSOCIATES

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9 *Counsel for Plaintiff*

CERTIFICATE OF SERVICE

I am over the age of 18 and not a party to this action. This is to certify that today I electronically filed the within and foregoing **Request for Entry of Certificate of Default, Declaration of Mathew K. Higbee in Support of Request for Entry of Certificate of Default**, and **Exhibit A** and caused a copy of the foregoing documents to be served on Defendants by placing a true copy of the foregoing documents in a sealed envelope and serving them as follows:

Mailing the documents via First-Class U.S. Mail, postage prepaid, and properly addressed to the following addresses:

Deluxe Cosmetic Center
c/o Cheryl Chen, Registered Agent
2636 W. Olympic Blvd.
Diamond Bar, CA 91765

Cheryl Chen
23790 Canyon Vista Ct.
Diamond Bar, CA 91765

Kevin Do
23790 Canyon Vista Ct.
Diamond Bar, CA 91765

Emailing the documents to Deluxe Cosmetic Center's business email address: info@deluxecosmeticcenter.com.

Respectfully submitted this 13th day of May, 2024.

/s/ Mathew K. Higbee
Mathew K. Higbee, Esq.
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